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REMARKS

Claims 1-14 were presented for examination. The Office Action rejects claims 1-14. This paper amends the specification and claims 1, 4, 10, and 12. Amendments to the specification correct various inadvertences; no new matter has been added. Claims 1 and 10 are amended to change a step of "converting" to a step of "translating" so that the terminology in these claims is more consistent with the terminology used in the specification. Such amendments are neither narrowing nor made in response to any particular rejection raised by the Office Action. Support for the amendments can be found generally in the Applicant's specification, and specifically on page 17, lines 25-27. The amendment to claim 4 is to avoid any possible ambiguity related to "said step of translating" that may arise from the amendment to claim 1. The amendment to claim 12 is cosmetic, and is neither narrowing nor made in response to any objection or rejection raised by the Office Action. Claims 1-14 remain pending in the application.

Rejection of claims 1-3, 5-9, and 11-14 under 35 U.S.C. § 103

The Office Action rejects claims 1-3, 5-9, and 11-14 under 35 U.S.C. 103(a) as being unpatentable over Norman (U.S. Patent No. 6,011,802) in view of Nakamura (U.S. Patent No. 6,385,213). Applicant respectfully traverses the rejection because the cited references, alone or in combination, do not teach or suggest all limitations as claimed in the Applicant's invention.

As now set forth in representative claim 1, in pertinent part, the Applicant's invention features a method of assembling a frame structure of a SDH signal. In the assembly of the frame structure, a hierarchically multiplexed administrative unit AU-n is translated into a tributary unit TU-n and this tributary unit TU-n is hierarchically multiplexed into the frame structure.

Norman discloses standard multiplexing structures of SDH and SONET communication signals. These standard multiplexing structures include multiplexed

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administrative units AU-3 and multiplexed tributary units TU-12 or TU-11. Nowhere, however, does Norman teach or suggest translating an administrative unit AU-n to a tributary unit TU-n, as set forth in the Applicant's claims. The Office Action recognizes this point by admitting "Norman does not expressly disclose the converting said AU-n to a tributary unit TU-n."

The other cited reference, Nakamura, also does not disclose or suggest translating an AU-n to a TU-n. The Office Action mistakenly equates a process of breaking down an AU4 signal to extract a TU signal therefrom, described in col. 3, lines 23-29 of Nakamura's Background, with the Applicant's converting (now, translating) of an AU-n to a TU-n. The process of breaking down involves decomposing a frame to extract a lower level signal from a higher level signal. Prior to extraction, Nakamura discloses that an AU-n signal contains the TU-n signal; that is, the TU-n signal already exists. The breaking-down process locates this TU-n signal within the AU-n signal and then extracts it. In contrast, the Applicant's translating rearranges the contents of an AU-n to produce a new TU-n. Before translation occurs, the AU-n does not contain the TU-n, nor is this TU-n extracted from the AU-n. In effect, the AU-n becomes the TU-n. This clearly illustrates that Nakamura's disclosed breaking-down process is not the Applicant's claimed translating.

Moreover, one of ordinary skill in the art would not look to combine the breaking-down process described in Nakamura with Norman's frame assembly process to produce the Applicant's invention because these processes have opposite purposes. Nakamura's process is for decomposing a frame, whereas Norman's process is for assembling a frame. Modifying Norman's assembly process to incorporate Nakamura's breaking-down process changes Norman's intended purpose. Therefore, there is no teaching or suggestion to combine these references to produce the Applicant's invention. Further, any combination of Norman and Nakamura still fails to disclose or suggest the Applicant's claimed invention because Nakamura, like Norman, fails to disclose the Applicant's claimed translating of an AU-n to a TU-n. Consequently, the Applicant respectfully requests that the rejection be withdrawn.

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Independent claim 11 recites similar language as claim 1, and therefore is patentable for at least those reasons provided with respect to claim 1. Also, neither Norman nor Nakamura teach or suggest a plurality of AU pointers being hidden in a TU pointer area as set forth in independent claim 12. Claims 2-9, 13 and 14 depend directly or indirectly from the patentable independent claims 1, 11 or 12, and incorporate all of the limitations of the appropriate independent claim, and therefore are also patentably distinguishable over the cited references for at least those reasons provided in connection with claims 1, 11, and 12. Therefore, the Applicant respectfully requests that the rejection against these claims also be withdrawn.

Rejection of claim 4 under 35 U.S.C. § 103

The Office Action rejects claim 4 under 35 U.S.C. 103(a) as being unpatentable over Norman in view of Nakamura in further view of Muller (U.S. Patent 5,465,252). The arguments presented above with respect to the cited references Norman and Nakamura are reiterated here with full force and effect. Further, Muller, like Norman and Nakamura, fails to teach or suggest translating an administrative unit AU-n to a tributary unit TU-n and multiplexing that tributary unit into a frame structure, as now set forth in the Applicant's claims. Moreover, claim 4 depends directly from patentable independent claim 1, and incorporates all of the limitations of claim 1, and is therefore patentable for at least this reason.

Rejection of claim 10 under 35 U.S.C. § 103

The Office Action rejects claim 10 under 35 U.S.C. 103(a) as being unpatentable over Norman in view of Kivi-Mannila (U.S. Patent No. 5,539,750). The arguments presented above with respect to Norman are reiterated here with full force and effect. Moreover, neither Kivi-Mannila nor Norman teaches or suggests translating a concatenated administrative unit AU-n-mc to a concatenated tributary unit TU-n-mc structure and multiplexing that concatenated TU-n-mc into a frame structure, as now set forth in the Applicant's claims. Accordingly, any combination of these references fails to teach or suggest the Applicant's claimed invention. Therefore, Applicant respectfully requests that the rejection be withdrawn.

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CONCLUSION

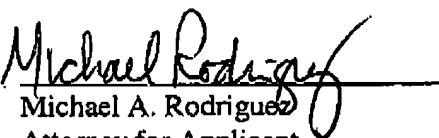
In view of the arguments made herein, Applicant submits that the application is in condition for allowance and requests early favorable action by the Examiner.

If the Examiner believes that a telephone conversation with the Applicant's representative would expedite allowance of this application, the Examiner is cordially invited to call the undersigned at (508) 303-2003.

Respectfully submitted,

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